

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

MATTHEW RAYMOND,

Plaintiff,

*-against-*

TROY MITCHELL, Lieutenant at Auburn Correctional Facility, CHARLES THOMAS, Correction Officer at Auburn Correctional Facility, THOMAS HARTE, Sergeant at Auburn Correctional Facility, THOMAS PHILLIPS, Correction Officer at Auburn Correctional Facility, THOMAS GIANCOLA, Correction Officer at Auburn Correctional Facility, HAROLD D. GRAHAM, Former Superintendent of Auburn Correctional Facility, BRIAN BAUERSFELD, Correctional Hearing Officer of Auburn Correctional Facility, BRIAN O'HORA, Correction Officer at Auburn Correctional Facility, AIMEE HOPPINS, R.N., Dr. DEBORAH GEER, and "JOHN DOE", Correction Officer at Auburn Correctional Facility,

Defendants.

No. 18 Civ. 1467 (GLS) (ATB)

**DECLARATION OF EMMA L. FREEMAN**

**EMMA L. FREEMAN** declares, under penalty of perjury, pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am an associate at the law firm of Emery Celli Brinckerhoff & Abady LLP, attorneys for Plaintiff Matthew Raymond. I submit this declaration in support of Plaintiff's motion to quash the subpoena served upon the New York State Parole Board.

2. Attached as Exhibit 1 to this declaration is a true and correct copy of the subpoena dated April 5, 2021, and returnable on April 30, 2021, that Defendants served upon the

Buffalo Metro Area Office of the New York State Board of Parole, which requests the “entire parole file maintained for Matthew R. Raymond.”

Date: April 19, 2021  
New York, NY

/s/ Emma L. Freeman  
EMMA L. FREEMAN